REMARKS

In view of the above amendments and the following remarks, Applicant requests favorable reconsideration and allowance of the present application.

Claims 84-93 remain pending in this application, with Claims 84, 86 and 91 being independent. By this Amendment, Applicant has amended each of the independent claims.

Applicant notes that Claims 84-93 stand rejected under the judicially created doctrine of double patenting over Claims 1-84 of U.S. Patent No. 6,020,894. Applicant requests that any requirement for a Terminal Disclaimer be held in abeyance until there is otherwise allowable subject matter in this case.

Claims 84-93 stand rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 4,679,038 (Bantz, et al.) in view of U.S. Patent No. 4,896,275 (Jackson). Applicant traverses this rejection.

As recited in independent Claim 84, Applicant's invention is directed to a method of creating an image formed as a plurality of bands. The bands are formed independently of data included in the bands, and each of the bands represents an independently displayable portion of the image. Multiple passes are made over the bands to manipulate the image, with each of the bands being stored as independent compressed image data so that each of the bands is configured for independent manipulation.

As recited in independent Claim 86, Applicant's invention is directed to a method of creating an image formed as a plurality of bands or sections. The bands are

formed independently of data included in the bands, and each of the bands represents an independently displayable portion of the image. The method includes a step of storing the bands as independently compressed image data, and editing the image by affecting multiple passes over the bands. Each of the bands is configured for independent editing.

As recited in independent Claim 91, Applicant's invention is also directed to a method of creating an image. The method includes a step of rendering a band of image data forming a corresponding band of the image. The band is formed independently of data included in the band and the band represents an independently displayable portion of the image. In addition, the method includes compressing the band of image data to form a corresponding independent compressed band, and storing the corresponding independent compressed band.

Thus, the invention, as set forth in each of the above-discussed independent claims, involves compressing bands representing independently displayable portions of an image, with the bands being formed independently of the type of data included in the bands. This arrangement allows a small amount of memory to be used to retain a particular decompressed band of the image so that various manipulation functions can be performed on the decompressed image data. In this manner, manipulation of an image is possible on a band-by-band basis while the bulk of the image remains in a substantially compressed format.

The Bantz, et al. patent is directed to a band buffer display system. The Office Action acknowledges, and Applicant submits, that this patent does not describe the compression of image data as claimed in the present invention. Accordingly, Applicant

further submits that Bantz, et al. does not suggest any step to efficiently store the image in the bit map memory, such as by compression.

In fact, as indicated in the previous Amendments, Applicant submits that the Bantz, et al. patent teaches away from the compression of image data. That patent states that the disclosed invention "is based on the concept of a repetitious copy operation, done at full refreshed rates, from an image memory to a band buffer" (col. 8, lines 19-22). If such a system used compression or decompression of image data, the process of providing a copy operation at full refresh rates would be hindered. Thus, there would be no motivation to use a compression feature with the system described in that patent.

The Jackson patent is directed to a program implemented method for converting images in binary form into bit map representations. These representations include *only that image data essential for reproduction* (i.e., black data). The object of the method disclosed by Jackson is to reduce the amount of non-essential white image data that is required to be stored by an output device having limited storage.

Applicant respectfully submits that the Jackson patent does not remedy the deficiencies of the Bantz, et al. patent. In fact, Applicant submits that the Jackson patent teaches away from present invention for at least the following reasons. First, that patent discloses a method in which a group of rows or blocks of image data is stored in an input buffer, and then the group of rows or blocks of image data is analyzed one byte at a time. Second, that patent teaches that the bit map representations are generated based only on *black* data. Third, that patent teaches that each group of rows or blocks is processed until the *entire* image has been processed and that an entire page of data is compressed (col. 9,

lines 52-60). Thus, one with ordinary skill in the art would not read the Jackson patent to teach or suggest that bands of an image can be formed *independently of data included in the bands* and that each of the bands is stored as *independently compressed* image data. Further, that patent does not suggest that multiple passes over the bands can be used to manipulate the image.

Accordingly, Applicant submits that the Bantz, et al. and Jackson patents, taken alone or in combination, fail to disclose or suggest at least the features of creating an image formed as a plurality of bands (or sections), where the bands are formed independently of data included in the bands, with each of the bands representing an independently displayable portion of the image and with each of the bands stored as independently compressed image data, as recited in independent Claims 84 and 86.

In addition, Applicant also submits that those patents, taken alone or in combination, fail to disclose or suggest at least the features of rendering a band of image data forming a corresponding band of an image, where the band is formed independently of data included in the band and represents an independently displayable portion of the image, and compressing the band of image data to form a corresponding independent compressed band, as recited in independent Claim 91.

For the foregoing reasons, Applicant submits that the independent claims are distinguishable over the applied documents, whether those documents are taken alone or in combination, and requests withdrawal of the rejection under 35 U.S.C. § 103(a).

The remaining claims in the present application are dependent claims which depend from the independent claims discussed above, and thus are patentable over the

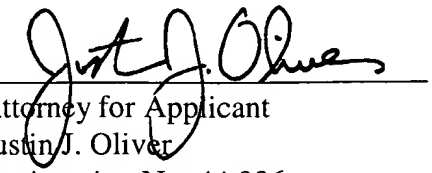
documents of record for reasons noted above with respect to those independent claims. In addition, each recites features of the invention still further distinguishing it from the applied documents. Applicant requests favorable and independent consideration thereof.

Applicant submits that the present Amendment places the application in condition for allowance. Applicant believes the present Amendment was necessitated by the Examiner's comments in the outstanding Office Action, and submits that the present amendments were not previously made because Applicant believed that the prior claims were allowable.

Applicant believes that the present Amendment is fully responsive to each of the points raised by the Examiner in the Office Action, and submits that the application is condition for allowance. Applicant requests favorable consideration of the claims and passage to issue of the subject application at the Examiner's earliest convenience.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



Attorney for Applicant
Justin J. Oliver
Registration No. 44,986

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200
JJO\DL\tmm

VERSIONS WITH MARKINGS TO SHOW
CHANGES MADE TO THE CLAIMS

84. (Twice Amended) A method of creating an image characterized in that the image is formed as a plurality of bands, the bands being formed independently of data included in the bands, with each of the bands representing an independently displayable portion of the image, in which multiple passes over the bands are used to manipulate the image, and wherein each of the bands is stored as independent compressed image data such that each of the bands is configured for independent manipulation.

86. (Amended) A method of creating an image formed as a plurality of bands or sections, the bands being formed independently of data included in the bands, with each of the bands representing an independently displayable portion of the image, said method comprising the steps of:

(a) storing each of the bands as independently compressed image data; and

(b) editing the image by effecting multiple passes over the bands, whereby each of the bands is configured for independent editing.

91. (Amended) A method of creating an image, said method comprising the steps of:

(a) rendering a band of image data forming a corresponding band of the image, the band being formed independently of data included in the band and the band representing an independently displayable portion of the image;

(b) compressing the band of image data to form a corresponding independent compressed band;

(c) storing the corresponding independent compressed band; and

(d) repeating steps (a) to (c) for each remaining band of the image thereby resulting in the image being formed of a plurality of stored bands of compressed image data.

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